



MSRB

Municipal Securities
Rulemaking Board

EMMA – Electronic Municipal Market Access

The Official Source for Municipal Disclosures and Market Data

Instructions for Forms G-37, G-37x and G-38t

Version 1.3, August 2015

Revision History

Version	Date	Description of Changes
1.0	February 2010	Initial version.
1.1	February 2013	Electronic submission of Forms G-37 and G-37x has been migrated to EMMA Dataport. This version provides instructions for submitting forms using EMMA Dataport.
1.2	September 2013	Updated the instructions for submitting additional information related to contributions made to bond ballot campaigns.
1.3	August 2015	Updated the Resources and Support section to reflect the change in hours of operation for Email Support.

Resources and Support

MSRB Website: www.msrb.org

EMMA Website: emma.msrb.org

For assistance, contact MSRB Support at 202-838-1330 or
MSRBsupport@msrb.org.

Live Support: 7:30 a.m. - 6:30 p.m. ET

Email Support: 7:00 a.m. – 7:00 p.m. ET

Municipal Securities Rulemaking Board

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Table of Contents

Part 1: General Submission Information 7

Part 2: Access for Electronic Submission of Forms G-37 and G-37x 12

Part 3: Electronic Submission of Form G-37 16

Part 4: Electronic Submission of Form G-37x 41

Part 5: Paper Submission of Forms G-37 and G-37x 44

Part 6: Paper Submission of Form G-38t 45

Introduction

The Municipal Securities Rulemaking Board (MSRB) protects investors, issuers of municipal securities, entities whose credit stands behind municipal securities and public pension plans by promoting a fair and efficient municipal market. The MSRB fulfills this mission by regulating securities firms, banks and municipal advisors that engage in municipal securities and advisory activities. To further protect market participants, the MSRB promotes disclosure and market transparency through its Electronic Municipal Market Access (EMMA®) website, provides education and conducts extensive outreach. The MSRB has operated under Congressional mandate with oversight by the Securities and Exchange Commission since 1975.

The EMMA website is a centralized online database operated by the MSRB that provides free public access to official disclosure documents and trade data associated with municipal bonds issued in the United States. In addition to current credit rating information, the EMMA website makes available real-time trade prices and primary market and continuing disclosure documents for over one million outstanding municipal bonds, as well as current interest rate information, liquidity documents and other information for most variable rate municipal securities. The EMMA website also makes available public disclosures of political contributions made by municipal securities dealers to governmental issuer officials, state and local political parties, and bond ballot referendum committees.

The purpose of these instructions is to assist brokers, dealers and municipal securities dealers (dealers) in submitting Forms G-37, G-37x and G-38t in an accurate and timely manner. [Rule G-37](#) requires each dealer to submit to the MSRB on Form G-37 certain information on its municipal securities business, as well as contributions to issuer officials, payments to state or local political parties and contributions to bond ballot campaigns made by the dealer, its municipal finance professionals (MFPs) and non-MFP executive officers, and political action committees (PACs) controlled by the dealer or its MFPs. Dealers are also required to submit additional information related to dealer contributions to bond ballot campaigns.

[Rule G-38](#) requires dealers making transitional payments for past services provided by consultants under former Rule G-38 (as in effect prior to August 29, 2005) to submit to the MSRB on Form G-38t certain information concerning such

consultants used to obtain municipal securities business, including information regarding compensation arrangements, municipal securities business obtained, payment amounts pending and certain reportable political contributions and political party payments. Under certain circumstances, dealers may become exempted from most of the requirements of Rule G-37 by submitting Form G-37x to the MSRB.

Part 1: General Submission Information

Form G-37

Submission Requirements for Form G-37

Form G-37 must be submitted to the MSRB for a calendar quarter if either of the following occurred:

- Reportable political contributions, payments to political parties, or contributions to bond ballot campaigns (and additional information) were made during the reporting period, unless the dealer has previously submitted Form G-37x and the submission remains effective; or
- The dealer engaged in municipal securities business during the reporting period.

Exemptions from Form G-37 Submission Requirement

Pursuant to Rule G-37(e)(ii)(A), a dealer is not required to submit a Form G-37 for a calendar quarter if both of the following are true:

- The dealer had no reportable contributions to issuers officials, payments to political parties or contributions to bond ballot campaigns for that calendar quarter; and
- The dealer did not engage in municipal securities business during that calendar quarter.

Form G-37x

Submission Requirements for Form G-37x

Pursuant to Rule G-37(e)(ii)(B), a dealer is not required to submit a Form G-37 for a calendar quarter if both of the following are true:

- The dealer has submitted a Form G-37x to the MSRB on or prior to the deadline for submission of Form G-37 for that calendar quarter; and
- The Form G-37x submission remains in effect as of the end of that calendar quarter.

A dealer may submit Form G-37x to the MSRB if the dealer did not engage in municipal securities business during the eight full consecutive calendar quarters ending immediately on or prior to the date of the submission.

A dealer newly registered with the MSRB that does not intend to engage in municipal securities business may submit a Form G-37x to the MSRB.

The Form G-37x submission remains effective for so long as the dealer does not engage in municipal securities business; thus, the dealer should not submit any additional Forms G-37x to the MSRB unless the original Form G-37x submission has become ineffective and the dealer subsequently re-qualifies to file Form G-37x.

Lapse of Effectiveness of Form G-37x Submission

A Form G-37x submitted to the MSRB by a dealer becomes ineffective immediately upon the dealer becoming engaged in municipal securities business. Such dealer will be obligated to submit Form G-37 to the MSRB beginning with the report for the calendar quarter in which such municipal securities business that caused the lapse of effectiveness occurred. Pursuant to Rule G-37(e)(iii), the first Form G-37 submitted subsequent to the lapse of Form G-37x must include information regarding any contributions to issuer officials, payments to state or local political parties or contributions to bond ballot campaigns that would have been reportable (but had not been reported) on Form G-37 during the two-year period preceding such calendar quarter.

The existence of political contributions to issuer officials, payments to political parties or contributions to bond ballot campaigns that would otherwise be reportable on Form G-37 does not result in the lapse of effectiveness of a Form G-37x. As noted above, however, such contributions and payments may become reportable upon the lapse of

effectiveness of Form G-37x if made less than two years prior to such lapse.

Form G-38t

Submission Requirements for Form G-38t

Form G-38t must be submitted to the MSRB for a calendar quarter if either of the following occurred:

- Solely for the reporting period ending on September 30, 2005, the dealer used consultants during the reporting period under former Rule G-38 (as in effect prior to August 29, 2005); or
- One or more transitional payments to consultants remain pending or are paid during the reporting period under Rule G-38(c) for solicitation activities undertaken on or prior to August 29, 2005.

Exemptions from Form G-38t Submission Requirement

A dealer is not required to submit a Form G-38t for a calendar quarter if the dealer has no required information to report. However, Rule G-38(c)(i)(B) provides that transitional payments to consultants for solicitation activities undertaken on or prior to August 29, 2005 may only be made by a dealer if, among other things, each item of municipal securities business for which payment remains pending (together with a specific dollar amount or objective formula for determining the specific dollar amount of the pending payment) is listed on the Form G-38t submitted for the quarter ending on September 30, 2005 and on each subsequent quarterly Form G-38t until such quarter in which payment is finally made. That is, a pending payment must be listed on Form G-38t for every quarter ending on or after September 30, 2005 until paid.

All Forms

Separate Submissions Required by Each Dealer

Affiliated dealers may not combine their required reporting under Rules G-37 and G-38 into a single Form G-37, G-37x or G-38t covering all such affiliated dealers. Each dealer must submit its own Form G-37, Form G-37x or G-38t, as appropriate.

Timing of Submission of Forms G-37, G-37x and G-38t

Rules G-37 and G-38 require dealers to submit Forms G-37 and G-38t to the MSRB by the last day of the month following the end of each calendar quarter. These submission dates correspond to January 31, April 30, July 31 and October 31 of each year.

There is no fixed time frame for submission of Form G-37x. However, if a dealer wishes to rely on the Form G-37x exemption from the Form G-37 submission requirement for a particular calendar quarter, Form G-37x must be submitted by no later than the submission deadline for such quarter.

Paper or Electronic Submission of Forms G-37, G-37x and G-38t

Paper submissions of Forms G-37, G-37x and G-38t must be sent to the MSRB by certified or registered mail, or some other equally prompt means that provides a record of sending. Rule G-37 requires that two copies of completed Form G-37 or G-37x, as appropriate, be sent to the MSRB.

Similarly, Rule G-38 requires that two copies of completed Form G-38t be sent to the MSRB. Form G-38t may only be submitted to the MSRB in paper form. At least one copy of Form G-37, G-37x or G-38t submitted on paper must contain an original signature.

Submissions by fax will not be accepted.

Each dealer must submit an email address for purposes of receiving electronic records of submissions through the eG-37 System.

Forms G-37 and G-37x submitted through the eG-37 System may be completed using an online data-entry form. The data-entry form for Form G-37 permits certain items of information to be incorporated into the form by means of file uploading. In addition, a dealer is permitted to upload its entire Form G-37 rather than completing the form by means of data-entry. All documents uploaded

through the eG-37 System must be in portable document format (PDF).

Voluntary Submissions

Non-dealers (e.g., attorneys, independent financial advisors) may voluntarily submit information on political contributions as long as the filing procedures are followed.

Viewing Forms Submitted to MSRB

The Forms G-37, G-37x and G-38t submitted to the MSRB are made available to the public on the MSRB's [Electronic Municipal Market Access \(EMMA®\) website](http://emma.msrb.org) at emma.msrb.org and can be accessed from the MSRB's website at www.msrb.org.

Part 2: Access for Electronic Submission of Forms G-37 and G-37x

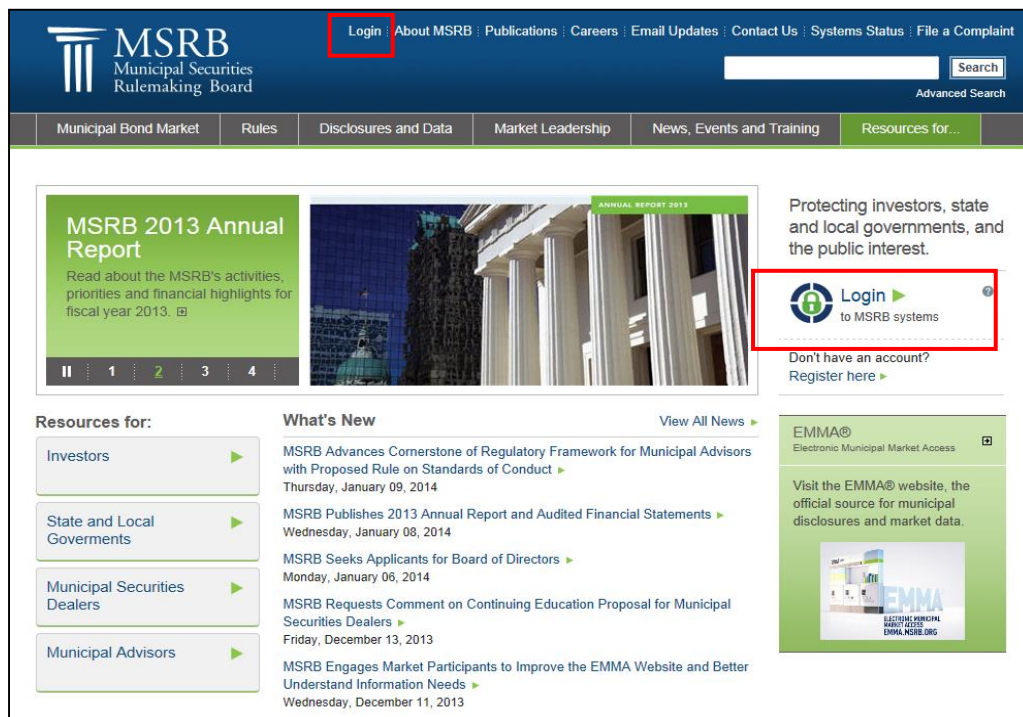
Users wishing to submit Forms G-37 or G-37x electronically to the MSRB can do so via EMMA Dataport.

An MSRB Gateway account is required to make submissions to EMMA Dataport. A firm's Primary Contact under MSRB Rule A-12 will create and manage user accounts via the MSRB Gateway system to complete the registration process. See the [Gateway User Manual Dealers and Municipal Advisors](#) for guidance on how to create and manage a user account.

Submissions for Forms G-37 and G-37x can be done from the MSRB or EMMA homepage.

Log in from MSRB homepage

From the MSRB homepage at www.msrb.org, click **Login**.




Enter your User ID and Password and click **Login** to access the Gateway main menu.

MSRB
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Rulemaking Board

MSRB Home | Contact and Support

Log into MSRB Gateway



User ID

Password

[Forgot password?](#)

Login


[Don't have an account? Register ►](#)

[MSRB Gateway Manual ►](#)

Welcome to MSRB Gateway, the secure access point for all MSRB applications including EMMA. Click [here](#) for guidance on user account management and information about the MSRB's Gateway.

To return to MSRB.org from within the MSRB Gateway application, click on the MSRB Home link at the top right corner of the page.

If you are experiencing log-in or other system related problems, please check the [MSRB Systems Status Page](#) for more information. If you need additional help, please contact the MSRB via email at GatewaySupport@msrb.org or by phone at (703) 797-6668.

 [Access Online Training about Submitting to EMMA](#)

The MSRB recommends not bookmarking this page.

Log in from the EMMA homepage

From the EMMA homepage at <http://emma.msrb.org>, click the **EMMA Dataport** link at the top of the page.

The screenshot shows the EMMA homepage with the following elements:

- Header:** EMMA logo, "Electronic Municipal Market Access", "A service of the MSRB". Navigation links: MyEMMA, **EMMA Dataport** (highlighted), Contact Us. A "Quick Search" box with the placeholder "Enter CUSIP or Name".
- Navigation Bar:** ADVANCED SEARCH, BROWSE ISSUERS, FIND 529 PLANS, MARKET ACTIVITY, EDUCATION CENTER.
- Main Content Area:**
 - Left Sidebar:**
 - Are you new to EMMA?
 - Find prices, disclosures and other information for a specific municipal bond.**
 - Browse municipal securities information by issuer.
 - Explore municipal market trends and data.
 - Learn how the MSRB protects municipal market participants.
 - Search for a Specific Bond:**
 - Quick Search:** Find municipal bonds by CUSIP number or name. Includes a search box with "Enter CUSIP or Name".
 - Advanced Search:** Find municipal bonds based on certain specific characteristics, including rating, maturity and price.
 - MyEMMA Alerts:** Track the activity of a particular bond or groups of bonds with MyEMMA.
- Bottom Section:**
 - EMMA Education Center:** Learn more about the municipal bond market and how to use EMMA to make informed decisions.
 - What's New on EMMA:**
 - Tour Our New Homepage: Learn about EMMA's enhanced navigation.
 - EMMA 101 Video: Watch the EMMA 101 video and learn how EMMA can help investors.
 - MUNICIPAL MARKET RECAP:** Most Actively Traded Fixed Rate Securities for 12/31/2013. Includes a table with columns: Security Description, Maturity Date, Interest Rate (%), Price Average, Yield Average, and Number of Trades.

Security Description	Maturity Date	Interest Rate (%)	Price Average	Yield Average	Number of Trades
PENNSYLVANIA ECONOMIC DEV FING AUTH PKG SYS REV-CAPITOL REGION PKG SYS-SR-SER (12/23/2013)	01/01/2034	5	99.195	5.004	70
PORT AUTH N.Y. & N.J. CONS-ONE HUNDRED FORTY-SEVENTH (04/15/2007)	04/15/2037	4.75	99.446	4.795	38
NEW JERSEY ST TPK AUTH TPK REV-SER A (04/04/2013)	01/01/2038	5	102.9	4.465	32
NEW JERSEY ECONOMIC DEV AUTH REV-REF-SCH FACS CONSTR-SER NN (01/31/2013)	03/01/2028	5	107.456	3.887	32

Then click **Login** to access the MSRB Gateway.

From the MSRB Gateway Main Menu, click the **Market Transparency Systems** link, and then click **EMMA Dataport**.

Part 3: Electronic Submission of Form G-37

The EMMA Dataport Submission Portal displays tabs that represent the submission types you can make to EMMA. Click the **Political Contributions** tab.

The most recent submissions are displayed on the right, if applicable.

Click the **Create** button next to **Electronic Form G-37 Submission** to start a submission.

EMMA Dataport Submission Portal

MSRB GATEWAY

JOE DOE, email: jdoe@dealerxyz.com

Primary Market (Rule G-32) **Political Contributions (Rule G-37)**

Electronic Form G-37 Submission **CREATE**

Electronic Form G-37x Submission CREATE

Most Recent Submissions
No submissions have been made

Select the quarter and year for which Form G-37 is being submitted. Click the **Next** button.

EMMA Dataport - G37 Submission

MSRB GATEWAY

Submission Status: Not Published

You are currently acting on behalf of:

Back Next Exit

For a complete G-37 submission, report period is required.

REPORT PERIOD
*All fields Required

Select Quarter: 4 Select Year: 2012



You may only select a report period prior to the current reporting quarter. Calendar quarter must be used for the reporting period.

The electronic Form G-37 appears. You may either use the electronic data-entry form for direct input of information or attach a PDF document. Furthermore, the data-entry form for Form G-37 permits a submitter to upload supplementary attachments (such as tables of contributions or municipal securities business) as PDF files to the electronic form.

EMMA Dataport - G37 Submission		MSRB GATEWAY
Submission Status: Not Published		You are currently acting on behalf of: Dealer XYZ
		Back Preview Exit
REPORT PERIOD- FOURTH QUARTER, 2012 For a complete G-37 submission, all four sections are required. Refer to MSRB Rule G37 for required information.		
CONTRIBUTIONS MADE TO ISSUER OFFICIALS <input type="checkbox"/> Check here if none. Input Contribution Information Attach Contribution Information		
PAYMENTS MADE TO POLITICAL PARTIES OF STATES OR POLITICAL SUBDIVISIONS <input type="checkbox"/> Check here if none. Input Payment Information Attach Payment Information		
CONTRIBUTIONS MADE TO BOND BALLOT CAMPAIGNS <input type="checkbox"/> Check here if none. Input Bond Ballot Contribution Information Attach Bond Ballot Contribution Information		
ISSUERS WITH WHICH DEALER HAS ENGAGED IN MUNICIPAL SECURITIES BUSINESS A. Municipal Securities Business <input type="checkbox"/> Check here if none. Input Municipal Securities Business Information Attach Municipal Securities Business Information B. Ballot-Approved Offerings <input type="checkbox"/> Check here if none. Input Ballot-Approved Offering Information Attach Ballot-Approved Offering Information		

Contributions Made to Issuer Officials

To enter information on contributions made during the calendar quarter, click on the **Input Contribution Information** link.



If there were no contributions required to be reported pursuant to Rule G-37 during the calendar quarter, click the **Check here if none** checkbox.

EMMA Dataport - G37 Submission

Submission Status: Not Published

MSRB GATEWAY

You are currently acting on behalf of:

[Back](#) [Preview](#) [Exit](#)

REPORT PERIOD- THIRD QUARTER, 2012
For a complete G-37 submission, information in all four sections is required.

Contributions made to issuer officials

☐ Check here if none.

[Input Contribution Information](#) [Attach Contribution Information](#)

Dealers must report in this section all contributions made to issuer officials during the calendar quarter.

On the **Contribution Information** screen, enter the following fields:

- State
- Issuer Official Name
- Title of Issuer Official
- City/County/State or Other Political Division
- Contribution Amount
- Contributor Category
 - Dealer
 - Municipal Finance Professional
 - PAC controlled by the dealer
 - PAC controlled by a Municipal Finance Professional
 - Non-MFP Executive Officer



The **Title of the Issuer Official** must include the name of the city, county, state or other political subdivision of the office held or sought by the individual. If an issuer official of one issuer is seeking an office as an issuer official of a different issuer, both issuer official titles must be included in the field (e.g., for a contribution to a city mayor running for state governor, the titles for both offices must be included)

In all other cases, the issuer official title of the office currently held or of the office sought must be included (e.g., for a contribution to a private citizen running for state governor, the title of governor must be included; for a contribution to a state governor running for United States President, the title of governor must be included).

Submission Status: Not Published
You are currently acting on behalf of:

Back
Preview
Exit

CONTRIBUTION INFORMATION

Please provide the following details. All fields are required.

State:	<input type="text" value="VA"/>	Contribution Amount:	<input type="text" value="250.00"/>
Name of Issuer Official:	<input type="text" value="Issuer Official ABC"/>	Contributor Category:	<div style="border: 1px solid #ccc; padding: 2px;"> <div style="background-color: #0056b3; color: white; padding: 2px;">▼</div> <div style="padding: 2px;"> Dealer Municipal finance professional PAC controlled by the dealer PAC controlled by a municipal finance professional Non-MFP executive officer </div> </div>
Title of Issuer Official:	<input type="text" value="Issuer Official Title"/>		
City/County/State or Other Political Subdivision:	<input type="text" value="Virginia"/>		

For use in connection with automatic exemption from ban on municipal securities business only.

If this contribution is the subject of an automatic exemption pursuant to Rule G-37(j), check the following Exempted box and provide the date of such automatic exemption:

☐ Exempted

Date of exemption: (mm/dd/yyyy)

Save
Cancel

The terms “contribution,” “issuer official” (or “official of an issuer”), “MFP” (or “municipal finance professional”) and “non-MFP executive officer” are defined in Rule G-37(g).

De Minimis Exception

Dealers are not required to report any contributions made by an MFP or non-MFP executive officer to an issuer official for whom the MFP or non-MFP executive officer was entitled to vote and which contributions by such MFP or non-MFP executive officer, in total, do not exceed \$250 to the issuer official per election.

Format for Reporting Contributions

Each issuer official receiving a reportable contribution during the calendar quarter must be listed separately. Multiple contributions by a single contributor to a single issuer official may be combined into a single entry that includes the total amount contributed during that calendar quarter. In all other cases, contributions may not be combined (e.g., contributions made by two separate MFPs to the same issuer official must be listed separately).

Reporting of Contributions Made in Prior Quarters Upon Lapse of Form G-37x Effectiveness

If the dealer is submitting Form G-37 for the first time after the lapse of effectiveness of Form G-37x as a result of engaging in municipal securities business, Form G-37 must include information regarding any contributions to issuer officials that would have been reportable (but had not been reported) on Form G-37 during the two-year period preceding such calendar quarter. When reporting contributions made in calendar quarters preceding the quarter for which the first Form G-37 is being submitted, the dealer must indicate the quarter and year in which such contribution was made. The dealer need not include calendar quarter information for contributions made during the calendar quarter for which such Form G-37 is being submitted.

Reporting of Automatic Exemptions from Ban on Municipal Securities Business

If the dealer has exempted itself from the ban on municipal securities business pursuant to Rule G-37(j), the dealer must also include in its report of the contribution that is the subject of such exemption the date on which the dealer exercised such automatic exemption.

Click the **Exempted** checkbox and complete the **Date of exemption** field.

Submission Status: Not Published
You are currently acting on behalf of:

Back Preview Exit

CONTRIBUTION INFORMATION

Please provide the following details. All fields are required.

State: VA

Name of Issuer Official: Issuer Official ABC

Title of Issuer Official: Issuer Official Title

City/County/State or Other Political Subdivision: Virginia

Contribution Amount: 250.00

Contributor Category: Dealer

For use in connection with automatic exemption from ban on municipal securities business only.

If this contribution is the subject of an automatic exemption pursuant to Rule G-37(j), check the following Exempted box and provide the date of such automatic exemption:

☒ Exempted

Date of exemption: (mm/dd/yyyy)

Save Cancel

Click the **Save** button. A summary of the contribution information reported appears on the screen. To upload a PDF file supporting the contribution information, click the **Attach contribution information** link.

REPORT PERIOD- FOURTH QUARTER, 2011
For a complete G-37 submission, information in all four sections is required.

CONTRIBUTIONS MADE TO ISSUER OFFICIALS

State	Issuer Official	Contribution Amount(\$)	Contributor Category	Action
VA	Issuer Official ABC, Issuer Official Title of Virginia	\$250.00	Dealer	Edit Delete

[Input Contribution Information](#) | [Attach Contribution Information](#)

Click the **Browse** button to locate the file on your computer. Then click the **Upload** button.

EMMA Dataport - G37 Submission MSRB
GATEWAY

Submission Status: Not Published You are currently acting on behalf of:

[Back](#) [Preview](#) [Exit](#)

Upload Information

Attach a file: [Browse...](#)

[Upload](#) [Cancel](#)

The PDF is listed in the Summary under the **Documents Attached** section.

REPORT PERIOD- FOURTH QUARTER, 2011
For a complete G-37 submission, information in all four sections is required.

CONTRIBUTIONS MADE TO ISSUER OFFICIALS

State	Issuer Official	Contribution Amount(\$)	Contributor Category	Action
VA	Issuer Official ABC, Issuer Official Title of Virginia	\$250.00	Dealer	Edit Delete

Documents Attached

[Issuer Contribution Information.pdf](#) [Delete](#)

[Input Contribution Information](#) | [Attach Contribution Information](#)

Payments Made to Political Parties of States or Political Subdivisions

Dealers must report in this section all payments made to political parties of states and political subdivisions (including payments to national political parties for their non-federal accounts) during the calendar quarter.

To enter information on payments made to political parties of states or political subdivisions during the calendar quarter, click on the **Input Payment Information** link.



If there were no payments required to be reported pursuant to Rule G-37 during the calendar quarter, click the **Check here if none** checkbox.

Payments made to political parties of states or political subdivisions

☐ Check here if none.

[Input Payment Information](#) | [Attach Payment Information](#)

On the **Payment Information** screen, enter the following fields:

- State
- Political Party
- Payment Amount
- Contributor Category:
 - Dealer
 - Municipal Finance Professional
 - PAC controlled by the dealer
 - PAC controlled by a Municipal Finance Professional
 - Non-MFP Executive Officer

Submission Status: Not Published
You are currently acting on behalf of:
Back Preview Exit

PAYMENT INFORMATION

Please provide the following details. All fields are required.

State: VA
Payment Amount: 500.00

Political Party: Political Party ABC
Contributor Category:

- Dealer
- Municipal finance professional
- PAC controlled by the dealer
- PAC controlled by a municipal finance professional
- Non-MFP executive officer

Save Cancel

Click the **Save** button. A summary of the payment information reported appears on the screen.

[Back](#)
[Preview](#)
[Exit](#)

REPORT PERIOD- FOURTH QUARTER, 2011
 For a complete G-37 submission, information in all four sections is required.

CONTRIBUTIONS MADE TO ISSUER OFFICIALS

State	Issuer Official	Contribution Amount(\$)	Contributor Category	Action
VA	Issuer Official ABC, Issuer Official Title of Virginia	\$250.00	Dealer	Edit Delete

[Input Contribution Information](#) | [Attach Contribution Information](#)

PAYMENTS MADE TO POLITICAL PARTIES OF STATES OR POLITICAL SUBDIVISIONS

State	Political Party	Payment Amount(\$)	Contributor Category	Action
VA	Political Party	\$500.00	Municipal finance professional	Edit Delete

[Input Payment Information](#) | [Attach Payment Information](#)

The term “payment” is defined in Rule G-37(g).

De Minimis Exception

Dealers are not required to report any payments made by an MFP or non-MFP executive officer to a political party of a state or political subdivision in which the MFP or non-MFP executive officer was entitled to vote and which payments by such MFP or non-MFP executive officer, in total, do not exceed \$250 to that political party per year.

Format for Reporting Payments

Each state or local political party receiving a reportable payment during the calendar quarter must be listed separately. Multiple payments by a single contributor to a single state or local political party may be combined into a single entry that includes the total amount paid during that calendar quarter. In all other cases, payments may not be combined (e.g., payments made by two separate MFPs to the same state or local political party must be listed separately).

Reporting of Payments Made in Prior Quarters upon Lapse of Form G-37x Effectiveness

If the dealer is submitting Form G-37 for the first time after the lapse of effectiveness of Form G-37x as a result of engaging in municipal securities business, Form G-37 must include information regarding any payments to state or local political parties that would have been reportable (but had not been reported) on Form G-37 during the two-year period preceding such calendar quarter. When reporting payments made in calendar quarters preceding the quarter for which the first Form G-37 is being submitted, the dealer must indicate the quarter and year in which such payment was made. The dealer need not include calendar quarter information for payments made during the calendar

quarter for which such Form G-37 is being submitted.

To upload a PDF file supporting the payment information, click the **Attach Payment Information** link.

REPORT PERIOD- FOURTH QUARTER, 2011
For a complete G-37 submission, information in all four sections is required.

CONTRIBUTIONS MADE TO ISSUER OFFICIALS

State	Issuer Official	Contribution Amount(\$)	Contributor Category	Action
VA	Issuer Official ABC, Issuer Official Title of Virginia	\$250.00	Dealer	Edit Delete

[Input Contribution Information](#) | [Attach Contribution Information](#)

PAYMENTS MADE TO POLITICAL PARTIES OF STATES OR POLITICAL SUBDIVISIONS

State	Political Party	Payment Amount(\$)	Contributor Category	Action
VA	Political Party	\$500.00	Municipal finance professional	Edit Delete

[Input Payment Information](#) | [Attach Payment Information](#)

Click the **Browse** button to locate the file on your computer. Then click the **Upload** button.

EMMA Dataport - G37 Submission MSRB GATEWAY

Submission Status: Not Published You are currently acting on behalf of:

[Back](#) [Preview](#) [Exit](#)

Upload Information

Attach a file: [Browse...](#)

[Upload](#) [Cancel](#)

The PDF is listed in the Summary under the **Documents Attached** section.

[Back](#)
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[Exit](#)

REPORT PERIOD- FOURTH QUARTER, 2011
 For a complete G-37 submission, information in all four sections is required.

CONTRIBUTIONS MADE TO ISSUER OFFICIALS

State	Issuer Official	Contribution Amount(\$)	Contributor Category	Action
VA	Issuer Official ABC, Issuer Official Title of Virginia	\$250.00	Dealer	Edit Delete

[Input Contribution Information](#) | [Attach Contribution Information](#)

PAYMENTS MADE TO POLITICAL PARTIES OF STATES OR POLITICAL SUBDIVISIONS

State	Political Party	Payment Amount(\$)	Contributor Category	Action
VA	Political Party	\$500.00	Municipal finance professional	Edit Delete

Documents Attached

Payment Information.pdf	Delete
---	------------------------

[Input Payment Information](#) | [Attach Payment Information](#)

Contributions Made to Bond Ballot Campaigns

Dealers must report in this section all contributions made to bond ballot campaigns during the calendar quarter.

To enter information on contributions made to bond ballot campaigns, click on the **Input Bond Ballot Information** link.



If there were no contributions required to be reported pursuant to Rule G-37 during the calendar quarter, click the **Check here if none** checkbox.

CONTRIBUTIONS MADE TO BOND BALLOT CAMPAIGNS

☐ Check here if none.

[Input Bond Ballot Contribution Information](#) | [Attach Bond Ballot Contribution Information](#)

On the **Bond Ballot Contribution Information** screen, enter the following fields:

- State
- Official Name of Bond Ballot Campaign
- City/County/State or Other Political Subdivision
- Name of Issuing Entity
- Contribution Amount
- Contributor Category:
 - Dealer
 - Municipal Finance Professional
 - PAC controlled by the dealer
 - PAC controlled by a Municipal Finance Professional
 - Non-MFP Executive Officer
- Contribution Date

Submission Status: Not Published You are currently acting on behalf of:

[Back](#) [Preview](#) [Exit](#)

BOND BALLOT CONTRIBUTION INFORMATION

Please provide the following details about the contribution. All fields are required.

State:	VA	Contribution Amount:	1000.00
Name of Bond Ballot Campaign:	Bond Ballot Campaign A	Contributor Category:	
City/County/State or Other Political Subdivision:	Virginia	Contribution Date:	Dealer
Name of Issuing Entity:	Issuing Entity		Municipal finance professional
			PAC controlled by the dealer
			PAC controlled by a municipal finance professional
			Non-MFP executive officer

Are there any payments or reimbursements, related to this bond ballot contribution, received by each broker, dealer or municipal securities dealer, municipal finance professional or non-MFP executive officer from any third party.

☐ Yes ☒ No

[Save](#) [Cancel](#)

- Indicate if any of the payments or reimbursements related to the bond ballot contribution made were reimbursed by a third party. If yes, enter the name of the third party that made the payments or reimbursements and enter the amount paid.

Are there any payments or reimbursements, related to this bond ballot contribution, received by each broker, dealer or municipal securities dealer, municipal finance professional or non-MFP executive officer from any third party.

☒ Yes ☐ No

Name of Third Party Making Payments or Reimbursement:	Name of Third Party	Reimbursement Amount:	750.00
---	---------------------	-----------------------	--------

[Save](#) [Cancel](#)

Then click the **Save** button.

The term “bond ballot campaign” is defined in Rule G-37(g).

De Minimis Exception

Dealers are not required to report any contributions made by an MFP or non-MFP executive officer to a bond ballot campaign for a ballot initiative with respect to which the MFP or non-MFP executive officer was entitled to vote and which contributions by such MFP or non-MFP executive officer, in total, do not exceed \$250 per ballot initiative.

Format for Reporting Contributions

Each bond ballot campaign receiving a reportable contribution during the calendar quarter must be listed separately. Multiple contributions by a single contributor to a single bond ballot campaign may be combined into a single entry that includes the total amount contributed during that calendar quarter. In all other cases, contributions may not be combined (e.g., contributions made by two separate MFPs to the same bond ballot campaign must be listed separately).

Reporting of Contributions Made in Prior Quarters upon Lapse of Form G-37x Effectiveness

If the dealer is submitting Form G-37 for the first time after the lapse of effectiveness of Form G-37x as a result of engaging in municipal securities business, Form G-37 must include information regarding any contributions to bond ballot campaigns that would have been reportable (but had not been reported) on Form G-37 during the two-year period preceding such calendar quarter. When reporting contributions made in calendar quarters preceding the quarter for which the first Form G-37 is being submitted, the dealer must indicate the quarter and year in which such contribution was made. The dealer need not include calendar quarter information for contributions made during the calendar quarter for which such Form G-37 is being submitted.

A summary of the contribution information reported appears on the screen. To upload a PDF file supporting the contribution information, click the **Attach Bond Ballot Contribution Information** link.

Submission Status: Not Published You are currently acting on behalf of: Dealer XYZ

[Back](#) [Preview](#) [Exit](#)

REPORT PERIOD- FOURTH QUARTER, 2012
For a complete G-37 submission, all four sections are required. Refer to [MSRB Rule G37](#) for required information.

CONTRIBUTIONS MADE TO ISSUER OFFICIALS

State	Issuer Official	Contribution Amount(\$)	Contributor Category	
VA	Issuer Official ABC, Issuer Official Title of Virginia	\$250.00	Dealer	Edit Delete

[Input Contribution Information](#) | [Attach Contribution Information](#)

PAYMENTS MADE TO POLITICAL PARTIES OF STATES OR POLITICAL SUBDIVISIONS

State	Political Party	Payment Amount(\$)	Contributor Category	
VA	Political Party	\$500.00	Municipal finance professional	Edit Delete


Documents Attached

Payment Information.pdf	Delete
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[Input Payment Information](#) | [Attach Payment Information](#)

CONTRIBUTIONS MADE TO BOND BALLOT CAMPAIGNS

State	Name of Bond Ballot Campaign	City/County/State or Other Political Subdivision	Name of Issuing Entity	Contribution Amount(\$)	Contributor Category	Contribution Date	Name of Third Party Making Payments or Reimbursements	Reimbursements Amount	
VA	Bond Ballot Campaign ABC	Virginia	Issuing Entity	\$1,000.00	PAC controlled by the dealer	11/01/2012	Name of Third Party	\$750.00	Edit Delete

[Input Bond Ballot Contribution Information](#) | [Attach Bond Ballot Contribution Information](#) 

Click the **Browse** button to locate the file on your computer. Then click the **Upload** button.



You may use files that have been previously uploaded. Select the appropriate file from the **File(s) already uploaded** drop-down menu.

Submission Status: Not Published You are currently acting on behalf of:

[Back](#) [Preview](#) [Exit](#)

Upload Information

File(s) already uploaded: Select a previously attached file
Select a previously attached file
Payment Information.pdf

Attach a file: [Browse...](#)

[Upload](#) [Cancel](#)

The PDF is listed in the Summary under the **Documents Attached** section.

CONTRIBUTIONS MADE TO BOND BALLOT CAMPAIGNS								
State	Name of Bond Ballot Campaign	City/County/State or Other Political Subdivision	Name of Issuing Entity	Contribution Amount(\$)	Contributor Category	Contribution Date	Name of Third Party Making Payments or Reimbursements	Reimbursements Amount
VA	Bond Ballot Campaign ABC	Virginia	Issuing Entity	\$1,000.00	PAC controlled by the dealer	11/01/2012	Name of Third Party	\$750.00
Documents Attached								
Bond Ballot Information.pdf								Delete
Input Bond Ballot Contribution Information Attach Bond Ballot Contribution Information								

Issuers with which the Dealer has Engaged in Municipal Securities Business

In compliance with [Rule G-37](#), dealers must report in this section all issuers with which they have engaged in municipal securities business during the calendar quarter.

Municipal securities business consists of the following activities:

- **Negotiated underwriting** – the purchase of a primary offering from the issuer on other than a competitive bid basis, such as a negotiated underwriting of municipal securities. – **Examples:** a negotiated underwriting engaged in by a sole underwriter, syndicate manager or syndicate member must be reported; a negotiated underwriting in which a dealer acts solely as a selling group member need not be reported
- **Agency offering** – the offer or sale of a primary offering on behalf of the issuer, such as a private placement or the offering of municipal fund securities or any other municipal securities on an agency basis – **Examples:** an agency offering engaged in by a placement agent or primary distributor must be reported; an agency offering in which a dealer acts solely as a selling dealer need not be reported
- **Financial advisor** – the provision of financial advisory or consultant services to an issuer with respect to a primary offering, where the dealer was chosen on other than a competitive bid basis
- **Remarketing agent** – the provision of remarketing agent services to an issuer with respect to a primary offering, where the dealer was chosen on other than a competitive bid basis

A. Municipal Securities Business

To enter information on issuers with whom the dealer has engaged in municipal securities business, click the **Input Municipal Securities Information** link.



If there was no municipal securities business required to be reported pursuant to Rule G-37 during the calendar quarter, click the **Check here if none** checkbox.

ISSUERS WITH WHICH DEALER HAS ENGAGED IN MUNICIPAL SECURITIES BUSINESS

A. Municipal Securities Business

☐ Check here if none.

[Input Municipal Securities Business Information](#)

 |
 [Attach Municipal Securities Business Information](#)

B. Ballot-Approved Offerings

☐ Check here if none.

[Input Ballot-Approved Offering Information](#)

 |
 [Attach Ballot-Approved Offering Information](#)

On the **Municipal Securities Business** screen, enter the following fields:

- State
- Issuer Name
- Issuer City/County
- Municipal Securities Business Type
 - Negotiated underwriting
 - Agency offering (e.g., private placement, municipal fund securities, etc.)
 - Financial advisor
 - Remarketing agent

Submission Status: Not Published
You are currently acting on behalf of:

Back Preview Exit

MUNICIPAL SECURITIES BUSINESS

Please provide the following details about the issuer with which the dealer has engaged in municipal securities business.

State:

Issuer Name:

Issuer City/County:

Municipal Securities Business Type:

Negotiated underwriting

Agency offering (e.g., private placement, municipal fund securities, etc.)

Financial advisor

Remarketing agent

Save Cancel

Then click the **Save** button.

In the **Issuer** Name field, enter the complete name of the issuer. If the issuer name does not include the name of the city, county, state or other political subdivision of which it is part or instrumentality (such as an authority of a county or a department of a city), the name of such city, county, state or other political subdivision must be included.

The terms “issuer” and “municipal securities business” are defined in Rule G-37(g).

Activities Not Required to be Reported

Dealers are not required to report the purchase of a primary offering from the issuer on a purely competitive bid basis. In addition, dealers are not required to report participation in a primary offering of municipal bonds as a selling group member or in a primary offering of municipal fund securities as a selling dealer. Further, only business with a governmental issuer need be reported. For example, if a dealer serves as financial advisor to a non-governmental conduit borrower in a bond offering and does not provide financial advisory service to the governmental issuer, this activity should not be listed as financial advisory services for purposes of Form G-37.

Format for Reporting Municipal Securities Business

Each issuer with which the dealer has engaged in municipal securities business during the calendar quarter must be listed separately.

Time Frame for Reporting Municipal Securities Business

In determining when to list municipal securities business, dealers should adhere to the following guideline:

- For negotiated underwritings, include the municipal securities business by no later than the report for the calendar quarter in which the settlement date occurs;
- For agency offerings, include the municipal securities business by no later than the report for the calendar quarter in which the settlement date occurs; however, in the case of a continuous offering (e.g., municipal fund securities), such municipal securities business should be included by no later than the report for the calendar quarter in which the first sales are settled but need not be listed in future calendar quarters;
- For financial advisory services, indicate the municipal securities business in the report for the calendar quarter in which an agreement is reached to provide the services (Rule G-23, on activities of financial advisors, requires dealers to have a written agreement with issuers); thereafter, do not continue to list an ongoing financial advisory arrangement with an issuer but do list the services for any reporting period in which the settlement date for a new issue on which the dealer acted as financial advisor occurs; and
- For remarketing agent activities, indicate the municipal securities business in the

report for the calendar quarter in which an agreement is reached to provide the services; thereafter, do not continue to list an ongoing remarketing agent arrangement with an issuer.

To upload a PDF file supporting the municipal securities business information, click the **Attach Municipal Securities Business Information** link.

ISSUERS WITH WHICH DEALER HAS ENGAGED IN MUNICIPAL SECURITIES BUSINESS

A. Municipal Securities Business

☐ Check here if none.


[Input Municipal Securities Business Information](#) |
 [Attach Municipal Securities Business Information](#)

B. Ballot-Approved Offerings

☐ Check here if none.

[Input Ballot-Approved Offering Information](#) |
 [Attach Ballot-Approved Offering Information](#)

Click the **Browse** button to locate the file on your computer. Then click the **Upload** button.

 You may use files that have been previously uploaded. Select the appropriate file from the **File(s) already uploaded** drop-down menu.

Submission Status: Not Published You are currently acting on behalf of:

[Back](#) [Preview](#) [Exit](#)

Upload Information

File(s) already uploaded: Select a previously attached file

Attach a file:
Payment Information.pdf
Bond Ballot Information.pdf
Browse...

[Upload](#) [Cancel](#)

B. Bond Ballot-Approved Offerings

To enter information on the issuers with whom the dealer has engaged in municipal securities business related to bond ballot-approved offerings, click the **Input Ballot-Approved Offering Information** link.



If there was no business related to ballot-approved offerings required to be reported pursuant to Rule G-37 during the calendar quarter, click the **Check here if none** checkbox.

ISSUERS WITH WHICH DEALER HAS ENGAGED IN MUNICIPAL SECURITIES BUSINESS

A. Municipal Securities Business

☐ Check here if none.

[Input Municipal Securities Business Information](#) | [Attach Municipal Securities Business Information](#)

B. Ballot-Approved Offerings

☐ Check here if none.

[Input Ballot-Approved Offering Information](#) | [Attach Ballot-Approved Offering Information](#)



Information on ballot-approved offerings cannot be submitted without providing the required municipal securities business information for the same business. That is, any municipal securities business related to Ballot-Approved Offerings (Part B) must first be reflected in the Municipal Securities Business section (Part A).

PAYMENTS MADE TO POLITICAL PARTIES OF STATES OR POLITICAL SUBDIVISIONS

☐ Check here if none.

[Input](#)

CO

☐

[Input](#)

[Contribution Information](#)

ISSUERS WITH WHICH DEALER HAS ENGAGED IN MUNICIPAL SECURITIES BUSINESS

A. Municipal Securities Business

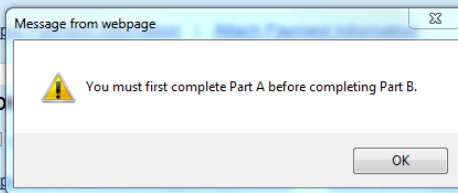
☐ Check here if none.

[Input Municipal Securities Business Information](#) | [Attach Municipal Securities Business Information](#)

B. Ballot-Approved Offerings

☐ Check here if none.

[Input Ballot-Approved Offering Information](#) | [Attach Ballot-Approved Offering Information](#)



On the **Ballot-Approved Offerings** screen, enter the following fields:

- Full Issuer Name
- Full Issue Description
- Reportable Date of Selection

Then click the **Save** button.

Submission Status: Not Published You are currently acting on behalf of:

[Back](#) [Preview](#) [Exit](#)

BALLOT-APPROVED OFFERINGS

Please provide the full issuer name and full issue description of any primary offering resulting from the bond ballot campaign to which each contributor category (i.e., dealer, dealer controlled PAC, municipal finance professional controlled PAC, municipal finance professionals and non-MFP executive officers) has made a contribution and the reportable date of selection on which the broker, dealer or municipal securities dealer was selected to engage in such municipal securities business. All fields are required.

Full Issuer Name: Reportable Date of Selection: (mm/dd/yyyy)

Full Issue Description:

[Save](#) [Cancel](#)

To upload a PDF file supporting the ballot-approved offerings, click the **Attach Ballot-Approved Offering Information** link.

ISSUERS WITH WHICH DEALER HAS ENGAGED IN MUNICIPAL SECURITIES BUSINESS

A. Municipal Securities Business

☐ Check here if none.

[Input Municipal Securities Business Information](#) | [Attach Municipal Securities Business Information](#)

B. Ballot-Approved Offerings

☐ Check here if none.

[Input Ballot-Approved Offering Information](#) | [Attach Ballot-Approved Offering Information](#)

Click the **Browse** button to locate the file on your computer. Then click the **Upload** button.



You may use files that have been previously uploaded. Select the appropriate file from the **File(s) already uploaded** drop-down menu.

Submission Status: Not Published You are currently acting on behalf of: [Back](#) [Preview](#) [Exit](#)

Upload Information

File(s) already uploaded: Select a previously attached file

Attach a file: [Browse...](#)

[Upload](#) [Cancel](#)

Select a previously attached file
Payment Information.pdf
Bond Ballot Information.pdf
Municipal Securities Business Info.pdf

The PDF(s) are listed in the Summary under the **Documents Attached** section.

ISSUERS WITH WHICH DEALER HAS ENGAGED IN MUNICIPAL SECURITIES BUSINESS			
A. Municipal Securities Business			
State	Issuer Name	Issuer City/County	Municipal Securities Business Type
VA	Issuer Name	City	Negotiated underwriting Edit Delete
Documents Attached			
Municipal Securities Business Info.pdf 			Delete
Input Municipal Securities Business Information Attach Municipal Securities Business Information			
B. Ballot-Approved Offerings			
Full Issuer Name	Full Issue Description	Reportable Date of Selection	
Issuer Name	Issue Description	11/01/2012 Edit Delete	
Documents Attached			
Bond Ballot Information.pdf 			Delete
Input Ballot-Approved Offering Information Attach Ballot-Approved Offering Information			

Now that all four required sections of Form G-37 are complete, you may preview the information, by clicking the **Preview** button.

Submission Status: Not Published You are currently acting on behalf of: Dealer XYZ

[Back](#) [Preview](#) [Exit](#)

REPORT PERIOD- FOURTH QUARTER, 2012
For a complete G-37 submission, all four sections are required. Refer to [MSRB Rule G-37](#) for required information.

CONTRIBUTIONS MADE TO ISSUER OFFICIALS

State	Issuer Official	Contribution Amount(\$)	Contributor Category	
VA	Issuer Official ABC, Issuer Official Title of Virginia	\$250.00	Dealer	Edit Delete
VA	Issuer Official ABC, Issuer Official Title of Virginia	\$250.00	Dealer	Edit Delete

[Input Contribution Information](#) | [Attach Contribution Information](#)

VA Political Party \$500.00 Municipal finance professional [Edit](#) | [Delete](#)

Documents Attached
[Payment Information.pdf](#) [Delete](#)

[Input Payment Information](#) | [Attach Payment Information](#)

CONTRIBUTIONS MADE TO BOND BALLOT CAMPAIGNS

State	Name of Bond Ballot Campaign	City/County/State or Other Political Subdivision	Name of Issuing Entity	Contribution Amount(\$)	Contributor Category	Contribution Date	Name of Third Party Making Payments or Reimbursements	Reimbursements Amount	
VA	Bond Ballot Campaign ABC	Virginia	Issuing Entity	\$1,000.00	PAC controlled by the dealer	11/01/2012	Name of Third Party	\$750.00	Edit Delete

Documents Attached
[Bond Ballot Information.pdf](#) [Delete](#)

[Input Bond Ballot Contribution Information](#) | [Attach Bond Ballot Contribution Information](#)

ISSUERS WITH WHICH DEALER HAS ENGAGED IN MUNICIPAL SECURITIES BUSINESS

A. Municipal Securities Business

State	Issuer Name	Issuer City/County	Municipal Securities Business Type	
VA	Issuer Name	City	Negotiated underwriting	Edit Delete

Documents Attached
[Municipal Securities Business Info.pdf](#) [Delete](#)

[Input Municipal Securities Business Information](#) | [Attach Municipal Securities Business Information](#)

B. Ballot-Approved Offerings

Full Issuer Name	Full Issue Description	Reportable Date of Selection	
Issuer Name	Issue Description	11/01/2012	Edit Delete

Documents Attached
[Bond Ballot Information.pdf](#) [Delete](#)

[Input Ballot-Approved Offering Information](#) | [Attach Ballot-Approved Offering Information](#)

If any information on the preview screen needs to be changed, click **Edit** to make the changes.



Submissions cannot be edited after they have been submitted to the MSRB. To make any changes, a new form must be submitted.

Once all information is correct, click the **Publish** button.

Submission Status: Not Published You are currently acting on behalf of: Dealer XYZ

Publish **Edit** **Exit**

BY CLICKING THE PUBLISH BUTTON, YOU WILL BE SUBMITTING THIS FORM TO THE MSRB.

PREVIEW

G-37 Contributions Summary
Report Period- Fourth Quarter, 2012

CONTRIBUTIONS MADE TO ISSUER OFFICIALS

State	Issuer Official	Contribution Amount(\$)	Contributor Category
VA	Issuer Official ABC, Issuer Official Title of Virginia	\$250.00	Dealer

PAYMENTS MADE TO POLITICAL PARTIES OF STATES OR POLITICAL SUBDIVISIONS

State	Political Party	Payment Amount(\$)	Contributor Category
VA	Political Party	\$500.00	Municipal finance professional

Documents Attached
[Payment Information.pdf](#)

CONTRIBUTIONS MADE TO BOND BALLOT CAMPAIGNS

State	Name of Bond Ballot Campaign	City/County/State or Other Political Subdivision	Name of Issuing Entity	Contribution Amount(\$)	Contributor Category	Contribution Date	Name of Third Party Making Payments or Reimbursements	Reimbursements Amount
VA	Bond Ballot Campaign ABC	Virginia	Issuing Entity	\$1,000.00	PAC controlled by the dealer	11/01/2012	Name of Third Party	\$750.00

Documents Attached
[Bond Ballot Information.pdf](#)

ISSUERS WITH WHICH DEALER HAS ENGAGED IN MUNICIPAL SECURITIES BUSINESS

A. Municipal Securities Business

State	Issuer Name	Issuer City/County	Municipal Securities Business Type
VA	Issuer Name	City	Negotiated underwriting

Documents Attached
[Municipal Securities Business Info.pdf](#)

B. Ballot-Approved Offerings

Full Issuer Name	Full Issue Description	Reportable Date of Selection
Issuer Name	Issue Description	11/01/2012

Documents Attached
[Bond Ballot Information.pdf](#)

Publish **Edit** **Exit**

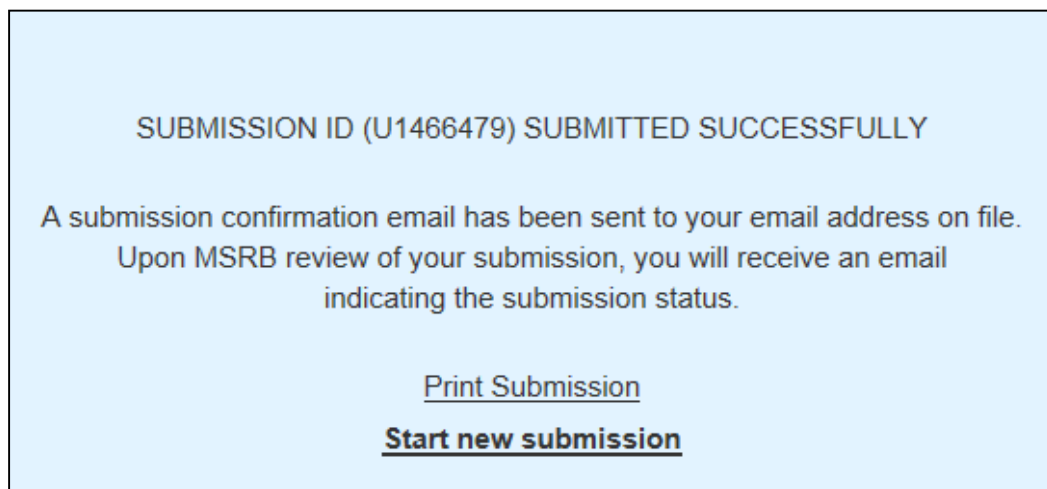
The following screen appears.

Are you sure you want to publish?

Click **Yes** and the following confirmation screen appears indicating the MSRB has received your Form G-37 submission. The MSRB reviews the submission and upon acceptance, the submission will automatically be published on the EMMA website. If the submission is rejected, you will receive an email indicating the reason(s) for the rejection.

To print your submission, click the **Print Submission** link. A PDF of the information submitted appears on the screen.

To start a new submission, click the **Start new submission** link.



Part 4: Electronic Submission of Form G-37x

Dealers must be fully cognizant of the acknowledgements and certification set forth in Form G-37x. In particular, dealers must be aware of the circumstances under which the effectiveness of Form G-37x may lapse and of the actions that dealers may be required to undertake pursuant to Rule G-37(e)(iii) upon such lapse.

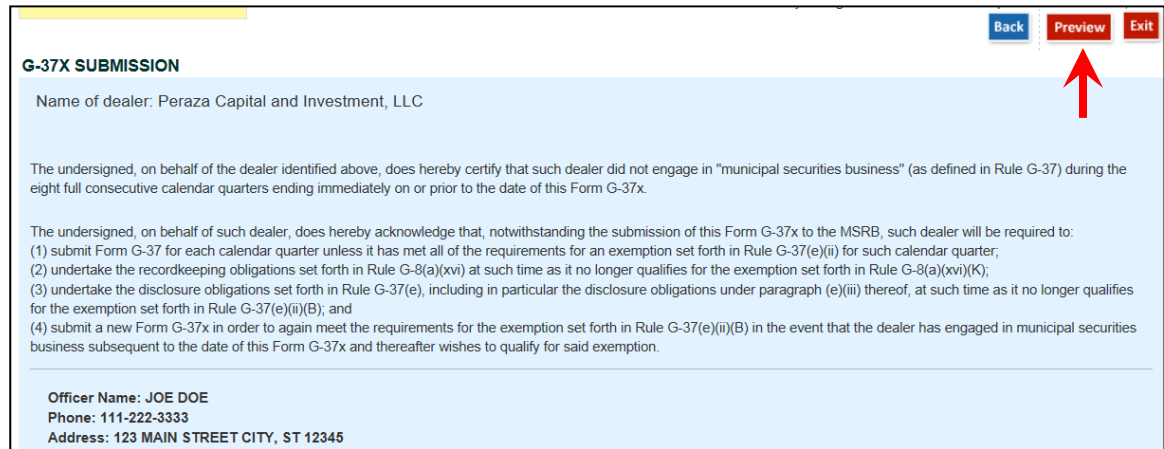
Click the **Create** button next to **Electronic Form G-37x Submission** to start a submission.

The screenshot shows the 'EMMA Dataport Submission Portal' header. On the right, it says 'MSRB GATEWAY' and 'JOE DOE, email: jdoe@dealerxyz.com'. Below the header, there are two tabs: 'Primary Market (Rule G-32)' and 'Political Contributions (Rule G-37)'. The 'Political Contributions' tab is active. In the main area, there are two rows of buttons: 'Electronic Form G-37 Submission' with a 'CREATE' link, and 'Electronic Form G-37x Submission' with a 'CREATE' button highlighted by a red rectangle. To the right, under 'Most Recent Submissions', it says 'No submissions have been made'.

The following screen appears. Your Officer Name, Phone Number and Address appear to the bottom left of the screen.

The screenshot shows the 'G-37X SUBMISSION' form. At the top right are 'Back', 'Preview', and 'Exit' buttons. The form title is 'G-37X SUBMISSION'. Below it, the 'Name of dealer' is 'Peraza Capital and Investment, LLC'. The form contains two paragraphs of text regarding the dealer's certification and acknowledgment. At the bottom left, a red box highlights the officer's information: 'Officer Name: JOE DOE', 'Phone: 111-222-3333', and 'Address: 123 MAIN STREET CITY, ST 12345'.

Click the **Preview** button.



G-37x SUBMISSION

Name of dealer: Peraza Capital and Investment, LLC

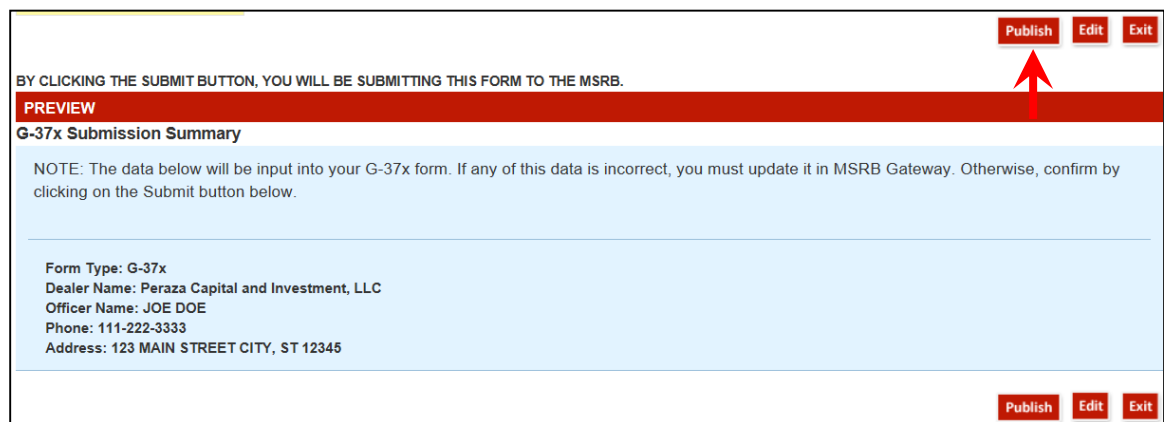
The undersigned, on behalf of the dealer identified above, does hereby certify that such dealer did not engage in "municipal securities business" (as defined in Rule G-37) during the eight full consecutive calendar quarters ending immediately on or prior to the date of this Form G-37x.

The undersigned, on behalf of such dealer, does hereby acknowledge that, notwithstanding the submission of this Form G-37x to the MSRB, such dealer will be required to:

- (1) submit Form G-37 for each calendar quarter unless it has met all of the requirements for an exemption set forth in Rule G-37(e)(ii) for such calendar quarter;
- (2) undertake the recordkeeping obligations set forth in Rule G-8(a)(xvi) at such time as it no longer qualifies for the exemption set forth in Rule G-8(a)(xvi)(K);
- (3) undertake the disclosure obligations set forth in Rule G-37(e), including in particular the disclosure obligations under paragraph (e)(iii) thereof, at such time as it no longer qualifies for the exemption set forth in Rule G-37(e)(ii)(B); and
- (4) submit a new Form G-37x in order to again meet the requirements for the exemption set forth in Rule G-37(e)(ii)(B) in the event that the dealer has engaged in municipal securities business subsequent to the date of this Form G-37x and thereafter wishes to qualify for said exemption.

Officer Name: JOE DOE
Phone: 111-222-3333
Address: 123 MAIN STREET CITY, ST 12345

The preview of Form G-37x appears on the screen. Click the **Publish** button.



BY CLICKING THE SUBMIT BUTTON, YOU WILL BE SUBMITTING THIS FORM TO THE MSRB.

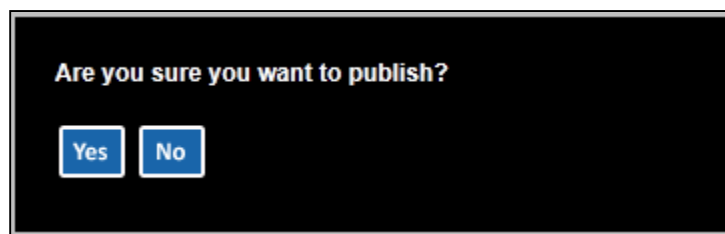
PREVIEW

G-37x Submission Summary

NOTE: The data below will be input into your G-37x form. If any of this data is incorrect, you must update it in MSRB Gateway. Otherwise, confirm by clicking on the Submit button below.

Form Type: G-37x
Dealer Name: Peraza Capital and Investment, LLC
Officer Name: JOE DOE
Phone: 111-222-3333
Address: 123 MAIN STREET CITY, ST 12345

The following screen appears.



Are you sure you want to publish?

Yes No

Click **Yes** and the following confirmation screen appears indicating the MSRB has received your Form G-37 submission.

To print your submission, click the **Print Submission** link.

To start a new submission, click the **Start new submission** link.

SUBMISSION ID (E1420105) SUBMITTED SUCCESSFULLY

A submission confirmation email has been sent to your email address on file.
Upon MSRB review of your submission, you will receive an email
indicating the submission status.

[Print Submission](#)

[Start new submission](#)

Part 5: Paper Submission of Forms G-37 and G-37x

Paper submissions of Forms G-37 and G-37x must be sent to the MSRB by certified or registered mail, or some other equally prompt means that provides a record of sending. To make a paper submission, download and follow the instructions as shown on the form. Current versions of these forms are available on the MSRB website at www.msrb.org.

Rule G-37 requires that two copies of completed Form G-37 or G-37x, as appropriate, be sent to the MSRB. At least one copy of Form G-37 or G-37x submitted on paper must contain an original signature. Submissions by fax will not be accepted.

The dealer name used should correspond with the name with which the firm has registered with the MSRB to engage in municipal securities activities – Rule A-15(c), on notification of name or address change, requires dealers to notify the MSRB promptly of any name or address change.

An officer of the dealer must sign and date Form G-37 or G-37x. An officer of the dealer refers to a corporate officer. The fact that someone is a compliance officer does not necessarily mean that person is a corporate officer.

One of the two forms submitted to the MSRB by paper must contain an original signature. Until at least one form with an original signature is received, the MSRB's records will not indicate that the dealer has complied with the submission requirements.

Include the date the form was signed, the name of the officer who signed the form, and the dealer's address and phone number.

Part 6: Paper Submission of Form G-38t

Paper submissions of Form G-38t must be sent to the MSRB by certified or registered mail, or some other equally prompt means that provides a record of sending. To make a paper submission, download and follow the instructions as shown on the form. Current versions of these forms are available on the MSRB website at www.msrb.org.

Name of Dealer and Report Period

The name used should correspond with the name with which the firm has registered with the MSRB to engage in municipal securities activities.

Rule A-15(c), on notification of name or address change, requires dealers to notify the MSRB promptly of any name or address change.

Indicate the quarterly period for the form being submitted

Dealers must use a calendar quarter for the reporting period; it is not acceptable to create a different time period and submit information only pertaining to that time.

Consultants for which Payments Are Made or Remain Pending During Reporting Period

Consultants Required to be Reported

Dealers must report in this section solely for the reporting period ending on September 30, 2005, all consultants used during the calendar quarter being reported through and including August 29, 2005; and all consultants to which one or more transitional payments remain pending or are paid during the reporting period under Rule G-38(c) for solicitation activities undertaken on or prior to August 29, 2005.

The term “consultant,” as defined in former Rule G-38(a)(i), is any person used by a dealer to obtain or retain municipal securities business through direct or indirect communication by such person with an issuer on behalf of the dealer where the communication is undertaken by such person in exchange for, or with the understanding of receiving, payment from the dealer or any other person. Former Rule G-38(a)(i) excluded from the definition of consultant any municipal finance professional (MFP) of the dealer submitting Form G-38t (however, an MFP of one dealer can be a consultant to a different dealer) and any person whose sole basis of compensation from the dealer is the actual provision of legal,

accounting or engineering advice, services or assistance in connection with the municipal securities business that the dealer is seeking to obtain or retain.

Listing of Consultants

The name of each consultant must be listed. The name listed must be the name of the consultant set forth in the consultant agreement required under former Rule G-38(b). If the dealer had a relationship with a consultant at any time during the reporting period ending on September 30, 2005, that consultant must be listed in the report for such reporting period even if the consultant received no compensation from the dealer during such period or undertook no affirmative efforts on behalf of the dealer during such period. For reporting periods ending after September 30, 2005, if a consultant has been fully paid or no further payments to the consultant remain pending, a dealer need not continue listing such consultant in future submissions of Form G-38t.

No Consultants to Report in Calendar Quarter

If the dealer had no consultant information required to be reported pursuant to Rule G-38 during the calendar quarter (i.e., the dealer did not use, or did not have a continuing relationship with, a consultant during the quarter ended September 30, 2005, or if the dealer did not make or have pending any transitional payments to consultants under Rule G-38(c)), then the dealer is not required to submit Form G-38t. However, Rule G-38(c)(i)(B) provides that transitional payments to consultants for solicitation activities undertaken on or prior to August 29, 2005 may only be made by a dealer if, among other things, each item of municipal securities business for which payment remains pending (together with a specific dollar amount or objective formula for determining the specific dollar amount of the pending payment) is listed on the Form G-38t submitted for the quarter ending on September 30, 2005 and on each subsequent quarterly Form G-38t until such quarter in which payment is finally made. That is, a pending payment must be listed on Form G-38t for every quarter ending on or after September 30, 2005 until paid.

Attachment to Form G-38t

Specific information about each consultant listed on Form G-38t must be described in separate attachment sheets to Form G-38t.

Name of Consultant

List the name of the consultant as set forth in the consultant agreement required under former Rule G-38(b).

Consultant's Business Address

A valid address at which the consultant may be reached is required.

Role Performed by Consultant

This description must include the state or geographic area in which the consultant is or was working on behalf of the dealer.

Compensation Arrangement

The arrangement must be clearly described and must be consistent with amounts reported under "Municipal Securities Business Obtained or Retained by Consultant" and "Total Dollar Amount Paid to Consultant During Reporting Period" on the attachment form for that consultant.

Municipal Securities Business Obtained or Retained by Consultant for Which Payment is Made or is Pending

Each item of municipal securities business obtained or retained by the consultant for the dealer must be listed separately. The dealer must indicate the specific dollar amount (or an objective formula for determining the specific dollar amount) of pending payments for each item of municipal securities business listed. Where pending payments cannot be reasonably allocated to a specific item of municipal securities business, such as where a dealer is contractually obligated to make a retainer payment that is not tied to specific items of municipal securities business, the dealer must indicate the specific dollar amount (or an objective formula for determining the specific dollar amount) of such pending payments and, in lieu of identifying a specific item of municipal securities business, must disclose that such payments are in respect to a contractual retainer or similar obligation and the geographic scope of the solicitation activities to which such payments relate.

In addition, the dealer must indicate the specific dollar amount paid to the consultant during the reporting period, if any, in connection with each such item of municipal securities business or each such retainer arrangement. Once a payment has been fully made or is no longer payable with respect to a specific item of municipal securities business or retainer arrangement, a dealer need not continue listing such item in future submissions of Form G-38t. Please note that Rule G-38(c)(i)(B) provides that transitional payments to consultants for solicitation activities undertaken on or prior to August 29, 2005 may only be made by a dealer if, among other things, each item of municipal securities business for which payment remains pending (together with a specific dollar amount or objective formula for determining the specific dollar amount of the

pending payment) is listed on the Form G-38t submitted for the quarter ending on September 30, 2005 and on each subsequent quarterly Form G-38t until such quarter in which payment is finally made. That is, a pending payment must be listed on Form G-38t for every quarter ending on or after September 30, 2005 until paid.

Notwithstanding the foregoing, in reporting information required to be reported concerning the use of consultants under former Rule G-38 during the period from July 1, 2005 to August 29, 2005 (the effective date of revised Rule G-38), any payments made to consultants on or prior to August 29, 2005 should be noted as such (e.g., “pre-8/29/2005 payment”) on the Form G-38t submitted for the calendar quarter ending September 30, 2005; any payments made after August 29, 2005 are permitted solely if they qualify as transitional payments and must comply with the reporting requirements described above.

Total Dollar Amount Paid to Consultant During Reporting Period

This must be a cumulative total for all payments made during the calendar quarter, regardless of whether payments were made in connection with a particular item of municipal securities business obtained or retained by the consultant. This total should be equal to the sum of all specific dollar amounts paid to the consultant during the reporting period included under “Municipal Securities Business Obtained or Retained by Consultant for Which Payment is Made or is Pending.”

Contributions

The dealer must list all reportable political contributions made to issuer officials and all reportable payments made to political parties of states and political subdivisions by:

- The consultant;
- Any partner, director, officer or employee of the consultant who communicates with an issuer official to obtain or retain municipal securities business for the dealer; or
- Any political action committee controlled by any of the foregoing.

The term “reportable political contribution” is defined in former Rule G-38(a)(vi).

Each issuer official receiving a reportable political contribution during the calendar quarter must be listed separately. Multiple contributions by a single contributor to a single issuer official may be combined into a single entry that

includes the total amount contributed during that calendar quarter. In all other cases, contributions may not be combined (e.g., contributions made by two separate contributors to the same issuer official must be listed separately). Each entry must include information in the same format required under Section I of Form G-37, provided that the contributor categories that must be used are as follows:

- Company
- Individual
- Company-controlled PAC
- Individual-controlled PAC

If the consultant has reported that there were no reportable political contributions or payments to political parties pursuant to former Rule G-38 during the calendar quarter, the dealer must include a statement that the consultant reported that no reportable political contributions or payments to political parties were made or indicate “none.” However, if the consultant has failed to provide the dealer with a report of information concerning reportable political contributions or payments to political parties, the dealer must include a statement that the consultant has failed to provide any report of information concerning reportable political contributions or payments to political parties. Merely indicating “none” does not satisfy this requirement.